



13th January 2018

Mr Steven Avery
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NTAV File no.: B5546 Former Hoffman Brickworks

Re: Permit application P27923—Former Hoffman Brickworks, 72-106 Dawson Street, Brunswick

Dear Mr Avery,

We strongly object to the above permit application to demolish building 5 (brick Pressing Shed) and building 6 (Former Engine House); construct a new building including an interpretation facility; and relocate the edge runner mill within the heritage core of the Former Hoffman Brickworks site.

The National Trust has been actively involved in the conservation and preservation of the Former Hoffman Brickworks site for three decades, including classifying the place on our Heritage Register at the State level in 1988. The Statement of Significance for the site identifies the significance of the place as follows:

The largest and most technology advanced brickworks in Melbourne during the land boom of the 1880s, [maintaining] a leading position in the industry during the first half of the twentieth century. In the early twentieth century it became the largest pottery in Victoria, producing building, sanitary and domestic products, including the decorated Melrose ware.

*The Classification is of the company's No 2 site, on Dawson Street (established 1883). It incorporates the three Hoffman kilns, the clay processing and **brickmaking building, including their pressed brickmaking machinery, the gatekeeper's cottage and offices, and the warehouses and pottery buildings.** [Our emphases.]*

As referenced in the National Trust Statement of Significance for the place (partially reproduced above and attached), buildings 5 and 6 are also specifically identified in the Victorian Heritage Register Statement of Significance as having primary and contributory heritage significance to the site. We submit that the significance of the place lies in the collection and cumulative whole of the retained buildings and their context, including the already heavily adapted and altered kilns, the retained chimneys, buildings 5 and 6, remnant artefacts and machinery across the footprint of the site, and the surrounding land included within the extent of registration. As such, we submit that buildings 5 and 6 are fundamental to the significance of the place, and the demolition of these buildings would adversely impact the significance of the site as a whole.

The Heritage Impact Statement [HIS] prepared as part of this permit application states (pg. 21) that while '*the demolition of the brick pressing shed will diminish the authenticity of the site to a*

degree, it will not result in an adverse effect overall as the brickworks site is not comprised solely of this building (s)'. The National Trust strongly disagrees with this assessment, submitting that the proposal to demolish buildings 5 and 6 would have an insurmountable impact on the cultural heritage significance of the registered place, and would represent a substantial loss for both the place as a whole and the architectural landscape of Victoria more broadly.

We note that a significant amount of heritage fabric has already been removed from the site since it was first added to the National Trust Heritage Register in 1988. It is our understanding that the adaptive re-use of buildings 5 and 6 was intended to be a mitigating compromise to offset the construction of new built form. As such, we believe that it is unacceptable to even contemplate the complete demolition of both buildings 5 and 6, and that the proponent has not demonstrated that this would be an acceptable outcome under the provisions of the *Heritage Act 2016*, as outlined in further detail below.

Structural Condition

The National Trust submits that the evidence provided in the HIS to support the lack of structural integrity as justification for full demolition does not present a *fait accompli* for the future preservation of buildings 5 and 6. We believe that the substantial work required to prop and brace the buildings to ensure structural stability and allow for future conservation work to be undertaken is reasonable, and indeed the responsibility of the proponent under the provisions of the *Heritage Act 2016*. As noted in the Beauchamp Hogg Spano Consultants report (pg. 2):

My opinion is that, fundamentally the buildings have been constructed to an excellent standard and subject to detailed structural fabric inspections, remedial works could address the building fabric faults identified and prolong the life of the building.

To the untrained eye this poor condition may be alarming, but in my opinion and subject to the remedial works described in this report, the fundamental structural fabric of the building is good and sound, and I would not condemn the buildings

Based on this assessment, we submit that sufficient justification to support the demolition of buildings 5 and 6 based on the current structural condition has not been provided.

Site Contamination

The HIS (pg. 1) notes the following in regard to the demolition of building 5:

Due to its long use for machinery and the pressing of bricks it now is contaminated, particularly in the soil beneath the structure, and remediation without demolishing the structure is not possible.

Similarly, the HIS (pg. 16) notes the following in regards to the demolition building 6:

The attached former engine house is semi-derelict, vacant and unused and unusable and is also contaminated. Also there is contamination in the ground under the building(s) and it is not possible to remediate it with the buildings in situ. Further, the exact extent of remediation will not be known until there is better access to the sub-ground which also is not possible with the buildings in situ.

The National Trust submits that the HIS does not provide adequate justification that soil remediation could not take place while the buildings were still in situ. We note that the letter from Compass Environment does not provide detailed specifications regarding soil contamination and remediation, and represents preliminary advice only.

We highlight in particular the following extract from the Beauchamp Hogg Spano Consultants (2014) report, pg. 15:

EPA Victoria has recognised the challenges and economies of scale for treating contaminated sites, especially Class A contaminants and have established publications that document a matrix of current soil remediation technology in Victoria.

This office recommends that all in-situ treatment technologies contained in the publication Industrial Waste Guidelines "Soil Remediation Technologies in Victoria" EPA Victoria be explored before decisions on the course of action are taken.

Most in-situ treatment processes are stated to be medium to long term in duration, (months to greater than six months)

We submit that all remediation practices that allow the buildings to remain in situ should be explored and documented before complete demolition is contemplated.

Dismantling and Reconstruction

Further, the HIS does not provide evidence that the dismantling and reconstructing all or part of buildings 5 and 6 to enable remediation to be undertaken is not possible (particularly if it is found that remediation could not be successfully undertaken while the buildings remain in situ). As stated in the HIS (pg. 16):

Further, they do not comply with any current building code and reconstruction would most likely require the introduction of much new material, for contamination and structural reasons, which would unacceptably diminish the authenticity of the structures.

The National does not believe that reconstruction would necessarily 'diminish the authenticity of the structure'. Reconstruction of all or part of a heritage place is recognised as a valid conservation process under Article 20 of the Burra Charter. While uncommon, there are notable precedents for complete reconstruction of fabric which have maintained the cultural heritage significance of the place, such as the reconstruction of the St Kilda Pier Kiosk in 2005.

We submit that the HIS does not examine the potential to dismantle the buildings, remediate the site and thus undertake reconstruction, nor does it contemplate the costs associated with various options that allow all or part of the buildings to be retained.

Site Interpretation

We note that a small interpretation centre has been proposed as a way to mitigate the significant impact that the demolition of buildings 5 and 6 would have on the cultural heritage significance of the place. The National Trust submits that this proposed interpretation centre does not represent an appropriate justification for the demolition of buildings of primary and contributory significance. Further, we question the layout and content of the proposed interpretation centre, how the centre will be maintained, managed and funded now and into

the future, and the impact on the significance of the place if the interpretation centre were to fail financially and thus be removed at a later date.

As outlined in the HIS, the permit application proposes the dismantling and removal of all but two of the nine brick presses, to be relocated into the proposed new interpretation centre. The National Trust notes that the HIS does not adequately address how this relocation process is proposed to be undertaken (based on best practice), the reasoning behind retaining only two of the nine brick presses, how the retention of only two presses would be able to adequately interpret the historical function of the machinery and the site, and what would happen to the remaining brick presses that were not incorporated into the new interpretation centre. We submit that retaining only two out of nine brick presses does not adequately capture or interpret the history and significance of the building, and as such, does not represent a positive heritage outcome.

Conclusion

To summarise, the National Trust strongly objects to this permit application, and we believe it should be refused outright. We do not consider that sufficient evidence has been provided to demonstrate that structural or contamination issues would justify the outcome sought by the proponent, or that retention and restoration is not possible. Further, we note that no evidence has been provided to demonstrate the extent to which the refusal of the permit would affect the “reasonable or economic use of the registered place”, under the provisions of Section 101 (2) of the *Heritage Act 2017*. As such, the only relevant matter for consideration is “the extent to which the application, if approved, would affect the cultural heritage significance of the registered place” (Section 101 (2), *Heritage Act 2017*).

Finally, we submit that the proponent’s mitigating response to this proposed demolition, specifically the creation of an interpretation centre, does not provide an adequate balance to the adverse and unacceptable impact the proposal would have on the place.

Please get in touch with this office on 9656 9837 if you require clarification regarding any of the points outlined above.

Kind Regards,



Caitlin Mitropoulos
Community Advocate—Built Heritage

Attached: National Trust Heritage Report, Former Hoffman Brickworks